

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Eddie Lane,	)	Civil Action No. 3:18-01386-JMC
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
New Gencoat, Inc.; Genesis Worldwide II	)	
Inc.; Pegasus Partners II L.P.; KPS Special	)	
Situation Funds L.P.; Gencoat Inc.; Genesis	)	
Worldwide Inc; Mitsubishi Heavy	)	
Industries, Ltd; Mitsubishi Heavy	)	
Industries America, Inc.; Hitachi Ltd;	)	
Hitachi America, Ltd; Mitsubishi-Hitachi	)	
Metals Machinery, Inc.; Mitsubishi-Hitachi	)	
Metals Machinery USA, Inc.; Primetals	)	
Technologies Ltd.; Primetals Technologies	)	
USA Holdings, Inc.; and Primetals	)	
Technologies USA LLC,	)	
	)	
Defendants.	)	
	)	

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**STIPULATION OF DISMISSAL  
WITHOUT PREJUDICE AS TO  
DEFENDANTS HITACHI, LTD. AND  
HITACHI AMERICA, LTD.**

The above-named parties stipulate and agree, pursuant to Rule 41(a)(1)(A) of the Federal Rules of Civil Procedure, that all claims asserted against Hitachi, Ltd. and Hitachi America, Ltd., are hereby dismissed in their entirety, without prejudice, hereby ending any litigation, disputes, or attempts to obtain relief or damages of any form or nature for any and all matters which were alleged or could have been alleged in this case against Hitachi, Ltd. and Hitachi America, Ltd.

This stipulation does not dismiss or otherwise affect Plaintiff's claims against the other Defendants in this case. The parties further stipulate and agree that they shall be responsible for their own costs and attorneys' fees.

*<<<Signatures begin on next page>>>*

**WE SO STIPULATE:**

BLUESTEIN THOMPSON SULLIVAN, LLC

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*Attorneys for Plaintiff*

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June 15, 2018

**WE SO STIPULATE:**

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Columbia, South Carolina

June 15, 2018